

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 25-MJ-1230

MOHAMMED MOHANUDDIN

Defendant

CRIMINAL COMPLAINT

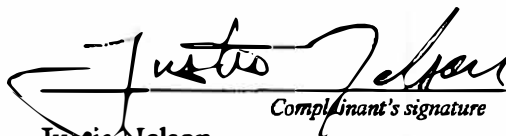
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

That between on or about June 29, 2024 and on or about July 2, 2024, in the Western District of New York, the defendant **MOHAMMED MOHANUDDIN**, did knowingly distribute child pornography and possess child pornography, as defined in Title 18 United States Code, Section, 2256(8), using any means or facility of interstate or foreign commerce or that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18 U.S.C. Section 2252A(a)(2) and 2252A(a)(5)(B).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

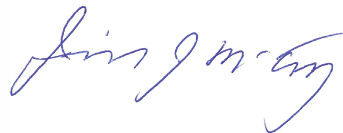

Complainant's signature

Justis Nelson
Special Agent
Federal Bureau of Investigation

Printed name and title

Sworn to before me telephonically.

Date: February 14, 2025



Judge's signature

City and State: Buffalo, New York

HONORABLE JEREMIAH J. MCCARTHY.
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, Justis Nelson, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and entered on duty in September 2022. I am currently assigned to the Buffalo Field Office Child Exploitation and Human Trafficking Task Force (“CEHTTF”), which targets individuals involved in the sexual exploitation of children and adults, as well as human trafficking offenders. As such, I am a law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 115(c)(1), who is “authorized by law or by Government agency to engage in or supervise the prevention, detention, investigation or prosecution of any violation of Federal criminal law.” As a Special Agent assigned to the CEHTTF, I have participated in investigations of persons suspected of violating federal child exploitation, child pornography, and human trafficking laws, including the drafting and execution of search and arrest warrants. I have participated in multiple investigations in which criminals used computer, cellular telephone, and other mobile communication technology to victimize children and adults, as well as communicate with their associates and undercover officers. I work with experienced FBI Special Agents and Task Force Officers, and I have consulted with numerous law enforcement officers experienced in child

exploitation investigations. I have also participated in FBI mandated and voluntary training for these matters.

2. This affidavit is made in support of a criminal complaint charging MOHAMMED MOHANUDDIN (MOHANUDDIN), date of birth July 24, 19XX, with violations of Title 18, United States Code, Section 2252A(a)(2) [Distribution of Child Pornography] and 2252A(a)(5)(B) [Possession of Child Pornography].

3. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, other personnel specially trained in the seizure and analysis of computers and electronic media, and on my experience and training. Since this affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that violations of Title 18, United States Code, Section 2252(a)(2) [Distribution of Child Pornography] and 2252A(a)(5)(B) [Possession of Child Pornography].

II. THE INVESTIGATION AND FACTUAL BASIS

4. On or about June 6, 2024, FBI Albany was contacted by a Task Force Officer (TFO) with the Federal Bureau of Investigation working with the Washington, District of Columbia Metropolitan Police Department (MPD) Child Exploitation and Human Trafficking Task Force (CEHTTF) who was working in an undercover capacity on a fetish website ("WEBSITE A"), hereafter the undercover agent. While many users of the site are

pursuing lawful, adult sexual activity, law enforcement knows that individuals also use WEBSITE A to pursue illicit sexual activity, including with children. Through investigation, the TFO with MPD/DC CEHTTF identified one M.K. as the subject of that investigation and was turned over to FBI Albany, NY CEHTTF.

5. On or about Friday, June 7, 2024, M.K. was arrested pursuant to a criminal complaint for distribution of child sexual abuse material (CSAM). M.K. agreed to speak with TFO CR Smith. During the course of the interview, M.K. indicated that he had been direct messaging with a subject on Website A as well as an encrypted messenger application. The user on Website A was known to M.K. as “Asurawarrior” and “Asura/@debilitate” on the messenger application. M.K. stated that Asurawarrior/Asura resided in the Buffalo, NY, area based upon conversations they had. Asurawarrior/Asura expressed interest in having sexual contact with M.K.’s seven- and nine-year-old daughter in the Albany, NY area. Asurawarrior/Asura advised M.K. that he would drug the children and indicated that he would travel immediately to the Albany, NY, area at that time for sexual contact with the children. M.K. stated that he became nervous based upon the nature of the direct messaging with Asurawarrior/Asura and ceased communication with him on both Website A and the direct messaging application. M.K. indicated to TFO Smith that Asurawarrior/Asura appeared to have a legitimate interest in traveling to meet him and having sexual contact with his two children. TFO Smith obtained consent to assume the online identity of M.K.’s Website A account as well as his encrypted messenger account. No chats remained on the Website A account and once TFO Smith logged into the encrypted messenger account, all prior chat communications had disappeared which was a function of that application.

6. On or about Thursday, June 20, 2024, TFO CR Smith was logged into M.K's encrypted messaging application and received a direct message from "Asura" with account name "@debilitate". Direct messaging ensued between Asura and Smith and continued as of June 30, 2024. During the course of the direct messaging between Asura and Smith, Asura indicated that he had previously sexually abused his sister when she was seven years old. Asura indicated that she was currently eighteen years old. Asura then indicated that he was planning on meeting another parent who would give him access for sexual contact with their four- and eight-year-old children. Asura indicated that he lived in the Buffalo, NY, area and indicated again that he would travel to the Albany, NY, area for sexual contact with the purported seven- and nine-year-old children.

7. On or about Saturday, June 29, 2024, Asura sent an image file on the encrypted messenger application at 11:19pm. The image depicts a female child approximately six or seven years of age. The child is holding an adult male's erect penis with her left hand and the penis is in her mouth. At approximately 12:07am on June 30, 2024, Asura sent a video file that was 1:58 minutes in length. The video file depicts a female child approximately four to five years old. The child is lying on her back on a bed. The child is wearing a ping shirt and blue underpants. The child is on her back and moves the underwear to the side exposing her genitals which are the focus of the image. The child places her finger on her vagina. The child then moves onto her hands and knees and removes the underwear exposing her anus and genitals. The child spreads her buttocks to expose her anus.

8. At approximately 2:10am, Asura sent an image file that depicts a clothed female child sitting on a couch, approximately seven to nine years old. Asura messaged TFO Smith that this child was with him and was his nine- or ten-year-old cousin. Asura indicated that he wanted to “really fuck” her and at 2:14am sent another image of the same clothed child seated on the couch. Asura then sent another image of the child as she stood up and faced away from the camera. There were two other clothed adults visible in the image with no faces visible. Asura sent two additional images and one video clip of the same child clothed but no face visible.

9. At approximately 9:46am, Asura sent five image files that are as follows: Image one depicts a female child approximately three to four years old from the waist up with no shirt on. The child has an adult erect penis in her mouth and is holding it with her right hand. Image two depicts a female child approximately six to seven years old seated in a vehicle and clothed. The child has a white creamy liquid substance on her face and is dripping from her chin. Image three depicts a child that is nude and, on their hands and knees from behind the child. There is an adult erect penis in the child’s anus. The genitals are blocked by the male’s penis, and it is unknown if the child is male or female. Image four depicts a female child approximately five to six years old. The child is on her back and nude from the waist down. The child’s legs are spread and there is an adult erect penis touching the child’s genitals. Image five depicts a female child approximately five to six years old. The child is completely naked and on her back with her legs spread. The genitals are the focus of the image, and an adult arm is spreading the child’s legs.

10. Asura stated that the images sent of the clothed child were his cousin who was nine or ten years old. Asura stated that he “had a crush on my cousin for a few years now” and that he “might lur her into my room with video games.” Asura indicated in the messaging that he had not had sexual contact with the child yet and that he would let TFO Smith know “how it goes. Im taking pics of her every day.”

11. A member of the FBI Albany CEHTTF served an administrative subpoena on the fetish website for username “Asurawarrior” that was identified on MK’s fetish website account. Asurawarrior’s fetish website account included a profile picture of an adult male of Middle Eastern descent. The website’s response included, an email and phone number that were used during the registration of the account. The email was, mohammed.mohanuddin@gmail.com, and the phone number was (347) 940-91XX. The email and phone number listed were identified in an open-source law enforcement database and both return to one Mohammed Mohanuddin, date of birth July 24, 19XX. An additional Department of Motor Vehicles query was conducted and identified Mohammed Mohanuddin, July 24, 19XX, residing at 1735 Amherst Street, Buffalo, New York. Open-source law enforcement databases list the same address for MOHANUDDIN as that of New York State Department of Motor Vehicles. Additionally, the provided NYS DMV driver’s license photo was visually similar to the image provided on the fetish website.

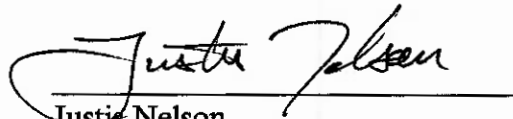
12. The administrative subpoena results for the fetish website also contain the username for the encrypted messaging application “@debilitate/Asura” which is the same username used to communicate with TFO Smith. On or about June 23, 2024, and June 25,

2024, TFO Smith completed a video call with Asura on the encrypted messaging application. During both video calls, the user of the Asura/@debilitate application was visible to TFO Smith. In both instances, the user was a Middle Eastern male that was visually similar to the image posted on the fetish website as well as the NYS DMV photo.

13. On or about July 2, 2024, a federal search warrant was executed whereby various electronics belonging to the defendant were seized. A search of the electronics resulted in the discovery of both video and image files of child pornography.

III. CONCLUSION

14. Based upon the above information, I assert that probable cause exists to believe that MOHAMMED MOHANUDDIN knowingly violated Title 18, United States Code, Section 2252(a)(2) [Distribution of Child Pornography] and 2252A(a)(5)(B) [Possession of Child Pornography]. As such it is respectfully requested the court issue a criminal complaint.


Justin Nelson
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed telephonically
on this 14th day of February 2025



HONORABLE JEREMIAH J. MCCARTHY
United States Magistrate Judge